

EXHIBIT A



Bedford County, Pennsylvania

Prothonotary

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12/7/2021 - 1:42 PM

Functions

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Prothonotary - Inquiry - Case Detail- Alt. View

Case No: **2021-00850** Filed Date/Time: **11/09/2021 7:54**
 Case Type: **TORT - MOTOR VEHICLE**
 Caption: **MICHAEL R DEHAAS & ETAL (vs) EURO KARM LTD & ETAL**

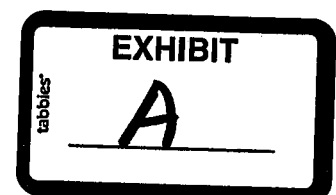
Reference No: Judgment Amount: **\$0.00**
 Judge Assigned: **LIVENGOOD TRAVIS W** Execution Date: **00/00/0000**
 Disposed Desc: Jury Trial?
 Case Comments: Disposition Date: **00/00/0000**
 Higher Court 1:
 Higher Court 2:

Sel	General Index - Litigant Names	Type
<input type="checkbox"/>	DEHAAS MICHAEL R	PLAINTIFF
<input type="checkbox"/>	DEHAAS RUTH A	PLAINTIFF
<input type="checkbox"/>	EURO KAM LTD	DEFENDANT
<input type="checkbox"/>	WTA GLOBAL INC	DEFENDANT

[More...](#)

Sel	Judgment Index - Litigant Names	Amount	Description
	No Judgment Litigants On File		

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Sel	General Index - Litigant Names	Type
<input type="checkbox"/>	SATYBALDIEV NURADYL	DEFENDANT
Bottom		

Sel	Judgment Index - Litigant Names	Amount	Description
	No Judgment Litigants On File		
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Prothonotary - Inquiry - Dockets Entries

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Position to Date: 00/00/0000

 Position to Page: of 1

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<input type="checkbox"/>	11/09/2021	COMPLAINT - TORT - MOTOR VEHICLE FILED WITH CERTIFICATE OF COMPLIANCE FILED BY MICHAEL B MAGEE ESQ.	14	
<input type="checkbox"/>	12/02/2021	PRAECIPE FOR APPEARANCE OF JAMES FIRMAN AND BRIAN SHEPARD, ESQUIRES ATTORNEYS FOR THE DEFENDANT WITH ATTORNEY CERTIFICATION WITH CERTIFICATE OF SERVICE FILED	4	
<input type="checkbox"/>	12/03/2021	ACCEPTANCE OF SERVICE FILED BY JAMES GIRMAN, ESQUIRE	1	
<input type="checkbox"/>	12/06/2021	NOTICE OF SERVICE OF PLAINTIFFS REQUEST FOR PRODUCTION OF DOCUMENTS DIRECTED TO DEFENDANTS EURO KAM LTD AND NURADYL SATYBALDIEV WITH CERTIFICATE OF SERVICE WITH CERTIFICATE OF COMPLIANCE FILED BY MICHAEL MAGEE, ESQUIRE	3	

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IN THE COURT OF COMMON PLEAS OF BEDFORD COUNTY, PENNSYLVANIA

MICHAEL R. DEHAAS and
RUTH A. DEHAAS, his wife,

Plaintiffs,

v.

EURO KAM, LTD., WTA GLOBAL,
INC., and NURADYL
SATYBALDIEV,

Defendants.

CIVIL DIVISION

No. 850-2021

PRAECIPE FOR APPEARANCE

Filed on behalf of:

**Euro Kam, Ltd., WTA Global, Inc., and
Nuradyl Satybaldiev,**
Defendants.

Counsel of Record for this Party

James M. Girman, Esquire
Pa. I.D. #58825

Brian L. Shepard, Esquire
Pa. I.D. #319322

PION, NERONE, GIRMAN, WINSLOW,
AND SMITH, P.C.

1500 One Gateway Center
420 Ft. Duquesne Boulevard
Pittsburgh, PA 15222

(412) 281-2288

JURY TRIAL DEMANDED

2021 DEC -2 AM 10:43
CLERK OF BEDFORD COUNTY

IN THE COURT OF COMMON PLEAS OF BEDFORD COUNTY, PENNSYLVANIA

MICHAEL R. DEHAAS, and
RUTH A. DEHAAS, his wife,

Plaintiffs,

v.

EURO KAM, LTD., WTA GLOBAL, INC.,
and NURADYL SATYBALDIEV,

Defendants.

Civil Division

No. 850-2021

JURY TRIAL DEMANDED

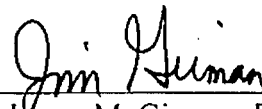
PRAECIPE FOR APPEARANCE

Kindly enter the appearance of James M. Girman, Esquire, Brian L. Shepard, Esquire and Pion, Nerone Girman, Winslow & Smith, P.C. on behalf of the Defendants, Euro Kam, Ltd., WTA Global, Inc. and Nuradyl Satybaldiev with regard to the above captioned matter.

Respectfully submitted,

PION, NERONE, GIRMAN, WINSLOW & SMITH

BY:



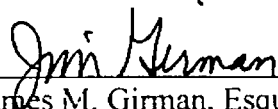
James M. Girman, Esquire
Brian L. Shepard, Esquire
Attorneys for Defendants,
Euro Kam, Ltd., WTA Global, Inc. and
Nuradyl Satybaldiev.

ATTORNEY CERTIFICATION

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

PION, NERONE, GIRMAN, WINSLOW & SMITH, PC

BY: _____



James M. Girman, Esquire
Brian L. Shepard, Esquire
Attorneys for Defendants,
Euro Kam, Ltd., WTA Global, Inc. and
Nuradyl Satybaldiev.

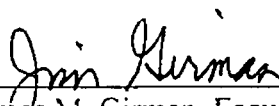
CERTIFICATE OF SERVICE

I, James M. Girman, Esquire, hereby certify that a true and correct copy of the foregoing Praecipe for Appearance was served upon counsel of record by e-mail, this 29th day of November, 2021 as follow:

Michael B. Magee, Esquire
Evey Black
401-03 Allegheny Street
P.O. Box 415
Hollidaysburg, PA 16648
mmagee@evevblack.com

PION, NERONE, GIRMAN, WILSOW & SMITH

BY: _____


James M. Girman, Esquire
Brian L. Shepard, Esquire
Attorneys for Defendants,
Euro Kam, Ltd., WTA Global, Inc. and
Nuradyl Satybaldiev.

Supreme Court of Pennsylvania

Court of Common Pleas

Civil Cover Sheet

Bedford

County

For Prothonotary Use Only:

Docket No:

850-2021

2021 NOV -9 AM

7:54

TIME STAMP

The information collected on this form is used solely for court administration purposes. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

SECTION A	Commencement of Action: <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Petition <input type="checkbox"/> Transfer from Another Jurisdiction <input type="checkbox"/> Declaration of Taking	
	Lead Plaintiff's Name: Micheal R. DeHaas	Lead Defendant's Name: Euro Kam Ltd
	Are money damages requested? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Dollar Amount Requested: <input type="checkbox"/> within arbitration limits (check one) <input checked="" type="checkbox"/> outside arbitration limits
	Is this a <i>Class Action Suit</i> ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Is this an <i>MDJ Appeal</i> ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Name of Plaintiff/Appellant's Attorney: Michael B. Magee <input type="checkbox"/> Check here if you have no attorney (are a Self-Represented [Pro Se] Litigant)		

SECTION B	Nature of the Case: Place an "X" to the left of the <u>ONE</u> case category that most accurately describes your PRIMARY CASE . If you are making more than one type of claim, check the one that you consider most important.		
	TORT (do not include Mass Tort) <input type="checkbox"/> Intentional <input type="checkbox"/> Malicious Prosecution <input checked="" type="checkbox"/> Motor Vehicle <input type="checkbox"/> Nuisance <input type="checkbox"/> Premises Liability <input type="checkbox"/> Product Liability (does not include mass tort) <input type="checkbox"/> Slander/Libel/ Defamation <input type="checkbox"/> Other: _____	CONTRACT (do not include Judgments) <input type="checkbox"/> Buyer Plaintiff <input type="checkbox"/> Debt Collection: Credit Card <input type="checkbox"/> Debt Collection: Other <input type="checkbox"/> Employment Dispute: Discrimination <input type="checkbox"/> Employment Dispute: Other <input type="checkbox"/> Other: _____	CIVIL APPEALS Administrative Agencies <input type="checkbox"/> Board of Assessment <input type="checkbox"/> Board of Elections <input type="checkbox"/> Dept. of Transportation <input type="checkbox"/> Statutory Appeal: Other <input type="checkbox"/> Zoning Board <input type="checkbox"/> Other: _____
	MASS TORT <input type="checkbox"/> Asbestos <input type="checkbox"/> Tobacco <input type="checkbox"/> Toxic Tort - DES <input type="checkbox"/> Toxic Tort - Implant <input type="checkbox"/> Toxic Waste <input type="checkbox"/> Other: _____	REAL PROPERTY <input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Ground Rent <input type="checkbox"/> Landlord/Tenant Dispute <input type="checkbox"/> Mortgage Foreclosure: Residential <input type="checkbox"/> Mortgage Foreclosure: Commercial <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Other: _____	MISCELLANEOUS <input type="checkbox"/> Common Law/Statutory Arbitration <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Mandamus <input type="checkbox"/> Non-Domestic Relations <input type="checkbox"/> Restraining Order <input type="checkbox"/> Quo Warranto <input type="checkbox"/> Replevin <input type="checkbox"/> Other: _____
	PROFESSIONAL LIABILITY <input type="checkbox"/> Dental <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional: _____		

IN THE COURT OF COMMON PLEAS OF BEDFORD COUNTY, PENNSYLVANIA

MICHAEL R. DEHAAS and
RUTH A. DEHAAS, HIS WIFE

Plaintiffs

v

EURO KAM LTD, WTA GLOBAL INC.
and
NURADYL SATYBALDIEV,

Defendants

CIVIL ACTION – LAW

No. 850 2021

2021 NOV -9 AM 7:54
CLERK OF COMMON PLEAS COURT

NOTICE TO DEFEND

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the Complaint or for any other claim or relief requested. You may lose money or other rights important to you.

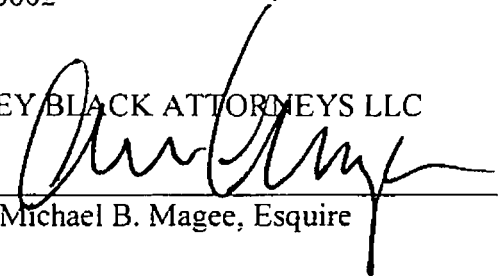
YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE, MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

MIDPENN LEGAL SERVICES
205 LAKEMONT PARK BOULEVARD
ALTOONA, PA. 16602
814 943-8193

EVEY BLACK ATTORNEYS LLC

By


Michael B. Magee, Esquire

Date: 11-4-21

TO: Defendants

YOU ARE HEREBY NOTIFIED TO FILE A
WRITTEN RESPONSE TO THE ENCLOSED

Complaint

within twenty (20) days from service hereof or
a judgment may be entered against you.

EVEY BLACK ATTORNEYS LLC

By 

Michael B. Magee, Esquire
Attorney for Plaintiffs
Pa. I.D. #21300
401 Allegheny Street
Hollidaysburg, Pa. 16648
(814) 695-7581

IN THE COURT OF COMMON PLEAS OF BEDFORD COUNTY, PENNSYLVANIA

MICHAEL R. DEHAAS and
RUTH A. DEHAAS, HIS WIFE

Plaintiffs

CIVIL ACTION – LAW

v

EURO KAM LTD, WTA GLOBAL INC.
and
NURADYL SATYBALDIEV,

Defendants

No. 850 2021

COMPLAINT

AND NOW, come Plaintiffs, Michael R. DeHaas and Ruth A. DeHaas individually and as husband and wife, by and through their attorney, Michael B. Magee of Evey Black, and files the following complaint and in support thereof, states as follows:

1. Plaintiff, Michael R. DeHaas, is an individual residing at 1158 Frankstown Road, Hollidaysburg, Pennsylvania and at all times material herein was and is the husband of Ruth A. DeHaas.
2. Plaintiff, Ruth A. DeHaas is an individual residing at 1158 Frankstown Road, Hollidaysburg, Pennsylvania and at all times material herein was and is the wife of Michael R. DeHaas.
3. Defendant, Euro Kam Ltd., (hereinafter "Euro Kam") upon information and belief, is a corporation with a place of business 1101 W Irving Park Road, Unit 200, Benesville, Illinois, 60106.
4. At all times material herein, Defendant Euro Kam was a Department of Transportation (DOT) authorized private interstate motor carrier, having been assigned U.S.

DOT #1130926, and therefore subject to the regulatory authority of Title 49 CFR of the Federal Motor Carrier Safety Regulations (FMCSR) which has been adopted by the Commonwealth of Pennsylvania.

5. Defendant, WTA Global, Inc., (hereinafter "WTA Global") upon information and belief is a corporation with a place of business located at 1101 W Irving Park Road, Suite 202, Benesville, Illinois, 60106.

6. At all times material herein, Defendant WTA Global was a Department of Transportation (DOT) authorized private interstate motor carrier, having been assigned U.S. DOT #2338057, and therefore subject to the regulatory authority of Title 49 CFR of the Federal Motor Carrier Safety Regulations (FMCSR) which has been adopted by the Commonwealth of Pennsylvania.

7. Defendant, Nuradyl Satybaldiev, is an individual with a last known address of 1719 Quentin Road 5F, Brooklyn, New York 11229.

8. At all times material herein, Defendant Satybaldiev was 26 years old.

9. At all times material herein, Defendant Satybaldiev maintained a class D New York license, license number 559369746, expiration date of November 1, 2026.

10. At all times material herein, Defendant, Nuradyl Satybaldiev, was the operator of a tractor trailer (hereinafter "tractor trailer") bearing New Jersey License No. AW57H and was towing a semi-trailer.

11. At all times material herein, the tractor was owned by Defendant Euro Kam Ltd. and maintained the right of control and/or use of said tractor trailer at all times material herein.

12. At all times material herein, Defendant WTA Global owned and maintained the right of control and/or use of the trailer, Tag Number 24TRL8419D, at all times material herein.

13. At all times material herein, Defendant Satybaldiev, was acting as a servant, agent, workman, employee and/or representative of Defendant Euro Kam Ltd. and/or Defendant WTA Global and was operating the tractor trailer with the knowledge and permission of Defendants Euro Kam Ltd. and/or WTA Global and as such, he was required to comply with applicable state and federal safety regulations, including the commercial driver's license (CDL) standards, which incorporate the FMCSR and address the critical aspects of commercial driver performance and identify the specific knowledge and skills necessary for commercial drivers to perform their work in a safe, legal and efficient manner.

14. At all times material herein, Plaintiff, Michael R. DeHaas, was the owner and operator of a white 2015 Jeep Compass, (hereinafter "Jeep") bearing Pennsylvania License number KHR2775.

15. At all times material herein, Plaintiff, Ruth A. DeHaas, was a passenger in the right front seat of the Jeep.

16. On or about Saturday, December 7, 2019, at approximately 7:44 p.m., Defendant Satybaldiev was operating the tractor trailer in the east bound turning lane of US Route 30 in East Providence Township, Bedford County, Pennsylvania in the area of a private driveway and/or private roadway known as the Gateway Truck Stop and Travel Plaza.

17. It is believed and therefore averred that Defendant Satybaldiev was not familiar with East Providence Township, Bedford County, Pennsylvania in the area of US Rout 30 in the area known as the Gateway Truck Stop/Travel Plaza.

18. Plaintiff Michael R. DeHaas, with Ruth A. DeHaas as a passenger, was operating his Jeep in the right westbound through lane of US Route 30 in East Providence Township, Bedford County, Pennsylvania in the area of a private driveway and/or private roadway known as the Gateway Truck Stop and Travel Plaza.

19. As the Plaintiffs are travelling westbound on US Route 30, with the right of way, suddenly and without warning, Defendant Satybaldiev, attempts to make a left turn onto the private driveway/roadway in the tractor trailer driving into Plaintiffs' Lane of travel, directly into the left front driver side of the Plaintiffs' Jeep causing the Jeep to spin counterclockwise resulting in serious bodily injuries and damages to the Plaintiffs as more fully set forth below.

20. At no time from the point where Defendant Satybaldiev attempts to enter and cross the right westbound through lane of US 30 where the crash occurred, did Defendant Satybaldiev see the oncoming Jeep occupied by the Plaintiffs.

21. While still at the scene, Defendant Satybaldiev admits he struck the Plaintiffs' Jeep with the tractor trailer he was operating.

22. At the point of impact, Defendant Satybaldiev is looking at the entrance of the Gateway Truck Stop and Travel Plaza.

23. While still at the scene, after the crash, Defendant Satybaldiev admits he did not see the Plaintiffs' Jeep.

24. While still at the scene, after the crash, Defendant Satybaldiev admits he is looking at the entrance of the Gateway Truck Stop and Travel Plaza when the crash occurred.

25. At all times material herein, Plaintiffs had the right of way on the westbound through lane of US Route 30 in the area of where the aforementioned wreck occurred.

26. Contrary to the duties owed to the driving public and more specifically the Plaintiffs, Defendant Satybaldiev who was operating the tractor trailer with the permission, knowledge and acquiescence of Defendant Euro Kam and Defendant WTA Global, acted recklessly and in conscious disregard for the rights and safety of the Plaintiffs, in the following particulars:

- a) Failing to yield the right-of-way;
- b) Failing to follow the standards set forth in the CDL manual and the FMSCSR, specifically, standards relating to proper visual search methods, space management and hazard perception;
- c) Attempting to enter upon and cross a road without determining it is safe to do so;
- d) Attempting to enter upon the westbound through lane of US Route 30 where it was not reasonably safe to do so;
- e) Failing to stop his tractor trailer before attempting to enter upon and cross the through westbound through lane of US Route 30;
- f) Failing to ascertain the presence of oncoming traffic, and more specifically the Plaintiffs, in the westbound through lane of US Route 30 before attempting to enter upon and cross this roadway;
- g) Failing to properly observe the roadway;
- h) Driving a motor vehicle on a public highway in disregard of the rights and safety of others;
- i) Failing to control the vehicle;
- j) Failing to exercise the duty of vigilance;
- k) Attempting to move, cross and/or transfer his vehicle to another lane without giving any reasonable notice and/or warning to traffic and more specifically the Plaintiffs;
- l) Operating the tractor trailer with careless disregard for the safety of others, including but not limited to the Plaintiffs;

- m) Choosing to attempt to go across US Route 30 at a place and point in time that the Defendant knew or reasonably should have known would be dangerous to the safety of the driving public and more specifically, the Plaintiffs;
- n) Failing to see that movement of his vehicle could be made in safety;
- o) Failing to have the vehicle under proper and adequate control at the time;
- p) Violating 75 Pa. C.S. §3322 of the Motor Vehicle Code;
- q) Failing to keep an appropriate lookout to avoid turning in front of other vehicles;
- r) Failing to keep an appropriate lookout to avoid striking other vehicles; and
- s) Failing to use proper visual search methods to identify and evaluate surrounding traffic conditions, as required by 49 C.F.R. §383.111.

27. Defendants Euro Kam and WTA Global owed a duty to the general public and more specifically, the Plaintiffs, to ensure the drivers of its tractor trailers were properly trained to drive safely upon Pennsylvania and interstate highways.

28. Defendants Euro Kam and WTA Global owed a duty to the driving public and more specifically, the Plaintiffs, to ensure that its drivers hired and or permitted to drive commercial vehicles exhibited traits, habits, characteristics and behaviors which are consistent with care, safety, and competency.

29. The negligence of Defendants Euro Kam and WTA Global also consisted of permitting the tractor trailer to be operated by Defendant Satybaldiev when they knew or should have known that he would drive the tractor trailer in such a fashion to constitute a safety risk to the general public, and more specifically, the Plaintiffs.

30. The negligence of Defendants Euro Kam and WTA Global also consisted of failing to instruct its commercial motor vehicle drivers, including Defendant Satybaldiev, regarding compliance with all applicable regulations relating to proper visual search methods, space management and hazard perception.

31. It is believed and therefore averred that Defendants Euro Kam and WTA Global failed to properly qualify Defendant Satybaldiev to operate a commercial motor vehicle as required by federal and state adopted regulations.

32. It is believed and therefore averred that Defendants Euro Kam and WTA Global did not have in place effective policies, procedures, practices and programs to comply with applicable federal and state safety programs.

33. It is believed and therefore averred that before December 7, 2019, Defendants Euro Kam and WTA Global knew or should have known of Defendant Satybaldiev's carelessness, incompetency and other traits and behaviors inconsistent with safe driving yet continued to entrust its business of transporting cargo on public roadways to Defendant Satybaldiev.

34. It is believed and therefore averred that Defendants Euro Kam and WTA Global failed to adequately train and supervise its commercial motor vehicle drivers, specifically Defendant Satybaldiev, as to the requirements of 75 Pa. C.S. §3322 of the Motor Vehicle Code and the Federal Motor Carrier Safety Regulations, Sections 391.21, 391.23, 390.3, 382.305, Part 395 and 391.31.

35. The aforementioned conduct of the Defendants was outrageous, willful, reckless, negligent and indifferent to the safety and health of the driving public including the Plaintiffs.

COUNT I

MICHAEL R. DEHAAS v EURO KAM LTD, WTA GLOBAL INC.
and NURADYL SATYBALDIEV

36. Paragraphs One (1) thru Thirty-five (35) and the paragraphs in Count II are incorporated herein as though fully set forth at length.

37. As a direct and proximate result of the negligence of the Defendants, Plaintiff, Michael R. DeHaas, suffered various injuries about his body, including but not limited to fractures of the spine at C6 and C7 levels, fractured ribs, collapsed lung and a left neck hematoma with bleeding compromising his airway.

38. As a further result of the negligence of the Defendants, Plaintiff, Michael R. DeHaas, was taken to Bedford Memorial Hospital and intubated, then transferred to UPMC Altoona Hospital as a Level One Trauma, then life flighted to UPMC Presbyterian Hospital in Pittsburgh where he was admitted to Trauma Blue, Intensive Care Unit (ICU) and remained hospitalized until December 10, 2019.

39. As a further result of the negligence of the Defendants, Plaintiff, Michael R. DeHaas, has been obliged to undergo additional medical care and attention, and to incur various expenses, and he may be obliged to continue to expend such sums or incur such expenditures for an indefinite time in the future.

40. As a further result of the negligence of the Defendants, Plaintiff, Michael R. DeHaas, has suffered a loss of recoverable earnings and he may continue to suffer a loss of earnings and an impairment of his future earning capacity and power.

41. As a further result of the negligence of the Defendants, Plaintiff, Michael R. DeHaas, has suffered a permanent physical impairment of his neck and left shoulder areas which translates to an impairment of his entire bodily function.

42. As a further result of the negligence of the Defendants, Plaintiff, Michael R. DeHaas, has suffered physical pain, mental anguish, and humiliation and he may continue to suffer the same for an indefinite time in the future.

43. As a further result of the negligence of the Defendants, Plaintiff, Michael R. DeHaas, has suffered a loss of enjoyment of life.

44. As a further result of the negligence of the Defendants, Plaintiff, Michael R. DeHaas, has been deprived of the assistance, society, and companionship of his wife, all of which has been to his great personal damage and loss.

45. At all times material herein, Plaintiff, Michael R. DeHaas, is entitled to, full tort rights pursuant to the provisions of the Pennsylvania Motor Vehicle Financial Responsibility Law (75 Pa. C. S. A. §1701, et. seq.).

WHEREFORE, Plaintiff, Michael R. DeHaas, claims compensatory and punitive damages against the Defendants in an amount in excess of \$25,000, the jurisdictional limits requiring arbitration, plus interest and costs as allowed by law.

A jury trial is hereby demanded.

COUNT II

RUTH A. DEHAAS v EURO KAM LTD, WTA GLOBAL INC.
and NURADYL SATYBALDIEV

46. Paragraphs One (1) thru Forty-five (45) are incorporated herein by reference as though fully set forth at length.

47. As a direct and proximate result of the negligence of the Defendants, Plaintiff, Ruth A. DeHaas, suffered various injuries about his body, including but not limited to a closed and displaced right clavicle fracture, left wrist contusion and left ring finger laceration.

48. As a further result of the negligence of the Defendants, Plaintiff, Ruth A. DeHaas, has been obliged to undergo medical care and attention, including but not limited to an open reduction with internal fixation surgery on her right clavicle as well as a subsequent bone grafting procedure with removal of hardware, and to incur various expenses, and she may be obliged to continue to expend such sums or incur such expenditures for an indefinite time in the future.

49. As a further result of the negligence of the Defendants, Plaintiff, Ruth A. DeHaas, has suffered a loss of her future earning capacity and power.

50. As a further result of the negligence of the Defendants, in addition to the surgeries, Plaintiff, Ruth A. DeHaas, in has been required to undergo other medical care and treatment including but not limited to extensive physical therapy.

51. As a further result of the negligence of the Defendants, Plaintiff, Ruth A. DeHaas, has suffered a permanent physical impairment of her dominant right shoulder and arm which translates to an impairment of her entire bodily function.

52. As a further result of the negligence of the Defendants, Plaintiff, Ruth A. DeHaas, has suffered physical pain, mental anguish, and humiliation and she may continue to suffer the same for an indefinite time in the future.

53. As a further result of the negligence of the Defendants, Plaintiff, Ruth A. DeHaas, has suffered permanent disfigurement and scarring.

54. As a further result of the negligence of the Defendants, Plaintiff, Ruth A. DeHaas, has suffered a loss of enjoyment of life.

55. As a further result of the negligence of the Defendants, Plaintiff, Ruth A. DeHaas, has been deprived of the assistance, society, and companionship of her husband, all of which has been to her great personal damage and loss.

56. At all times material herein, Plaintiff, Ruth A. DeHaas, is entitled to, full tort rights pursuant to the provisions of the Pennsylvania Motor Vehicle Financial Responsibility Law (75 Pa. C. S. A. §1701, et. seq.).

WHEREFORE, Plaintiff, Ruth A. DeHaas, claims compensatory and punitive damages against the Defendants in an amount in excess of \$25,000, the jurisdictional limits requiring arbitration, plus interest and costs as allowed by law.

A jury trial is hereby demanded.

EVEY BLACK ATTORNEYS LLC

BY 

Michael B. Magee, Esquire
Attorney for Plaintiffs
Pa. I.D. #21300
401 Allegheny Street
Hollidaysburg, Pa. 16648
(814) 695-7581

DATE: 11.4.21

VERIFICATION

We hereby affirm that the following facts are true and correct.

We are the Plaintiffs in the foregoing action; the attached Complaint is based upon information which has been furnished to counsel and information, which has been gathered by counsel in the preparation of this lawsuit. The language of the Complaint is that of counsel and not of us. We have read the Complaint and to the extent that the same is based upon information which we have given to counsel, it is true and correct to the best of our knowledge, information and belief. To the extent that the content of the Complaint is that of counsel, we have relied upon counsel in making this Verification. We hereby acknowledge that the facts set forth in the Complaint are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

11-4-21
Date

11-4-21
Date

Michael R. DeHaas
Michael R. DeHaas

Ruth A. DeHaas
Ruth A. DeHaas

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: EVEY BLACK ATTORNEYS LLC

Signature: 

Name: Michael B. Magee

Attorney No. (if applicable): 21300

MICHAEL R. DEHAAS and
RUTH A. DEHAAS, HIS WIFE,
Plaintiffs

v.

EURO KAM LTD, WTA GLOBAL,
INC. and NURADYL
SATYBALDIEV,
Defendants

IN THE COURT OF COMMON PLEAS OF
BEDFORD COUNTY, PENNSYLVANIA

CIVIL ACTION - LAW

No. 850-2021

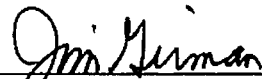
FILED
2021 DEC -3 PM 2:21
Clerk of Orphans Court

ACCEPTANCE OF SERVICE

I accept service of the Complaint on behalf of Euro Kam LTD, WTA Global, Inc.,
and Nuradyl Satybaldiev, and certify that I am authorized to do so.

PION LAW

By:


James M. Girman, Esquire
420 Fort Duquesne Blvd.
1500 One Gateway Center
Pittsburgh, PA 15222
412-281-2288

Date:

11/24/21

IN THE COURT OF COMMON PLEAS OF BEDFORD COUNTY, PENNSYLVANIA

MICHAEL R. DEHAAS and
RUTH A. DEHAAS, HIS WIFE

Plaintiffs

CIVIL ACTION – LAW

v

EURO KAM LTD, WTA GLOBAL INC.
and NURADYL SATYBALDIEV,

Defendants

No. 850- 2021

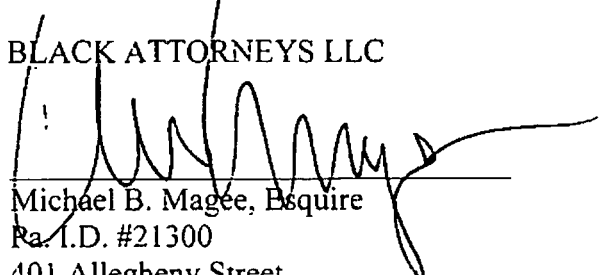
NOTICE OF SERVICE OF PLAINTIFFS'
REQUEST FOR PRODUCTION OF DOCUMENTS
DIRECTED TO DEFENDANTS EURO KAM LTD.
AND NURADYL SATYBALDIEV

You are hereby notified that on the 3 day of December, 2021, Plaintiffs served Plaintiffs' Interrogatories and Request for Production of Documents Directed to Defendants Euro Kam LTD. And Nuradyl Satybaldiev by mailing the same via First-class United States mail, postage prepaid, addressed to the following:

James M. Girman, Esquire
Pion Law
420 Fort Duquesne Blvd.
1500 One Gateway Center
Pittsburgh, PA 15222

EVEY BLACK ATTORNEYS LLC

By


Michael B. Magee, Esquire
Pa. I.D. #21300
401 Allegheny Street
PO Box 415
Hollidaysburg, PA 16648
(814) 695-7581

2021 DEC -6 AM 11:57
CLERK OF ORPHANS COURT

FILED

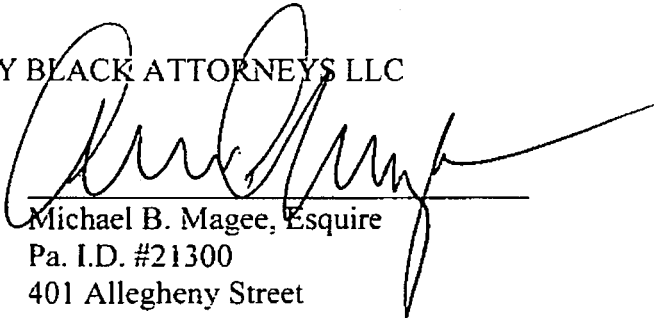
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on the 8 day of December, 2021 by first-class United States Mail, postage pre-paid, addressed to the following:

James M. Girman, Esquire
Pion Law
420 Fort Duquesne Blvd.
1500 One Gateway Center
Pittsburgh, PA 15222

EVEY BLACK ATTORNEYS LLC

By

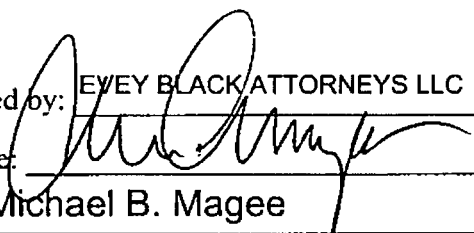


Michael B. Magee, Esquire
Pa. I.D. #21300
401 Allegheny Street
PO Box 415
Hollidaysburg, PA 16648
(814) 695-7581

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: EVEY BLACK ATTORNEYS LLC

Signature: 

Name: Michael B. Magee

Attorney No. (if applicable): 21300